



31-10 37th Avenue, Suite 401
Long Island City, New York 11101
Telephone: (347) 464-8694; Facsimile: (800) 483-4508
www.QueensEmploymentAttorney.com

November 13, 2015

Via ECF

Magistrate Judge Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East, 505 North
Brooklyn, New York 11201

Re: Lebowitz, et al. v. New York City Department of Education, et al.
15-cv-2890 (WFK)(VMS)

Dear Magistrate Judge Scanlon:

As you are aware, this office represents the Plaintiffs, Herman Lebowitz, Ekaterina Reznikov, and Keith Black, in the above-referenced matter. On May 19, 2015, Plaintiff, Herman Lebowitz, filed his Complaint in the above-referenced matter. On September 24, 2015, Plaintiffs, Ekaterina Reznikov and Keith Black, filed their Complaint in the above-referenced matter. On October 20, 2015, the Plaintiffs' cases were consolidated and on October 30, 2015, Plaintiffs filed an Amended Complaint.

On November 6, 2015, Plaintiff Ekaterina Reznikov received her Right to Sue letter from the Equal Employment Opportunity Commission and the Department of Justice. As such, Plaintiffs seek leave to amend the Amended Complaint in order to add Ms. Reznikov's Title VII claims. Plaintiffs' Counsel has attempted to contact Defendants' Counsel in order to obtain consent, but has not received a response. Accordingly, it is respectfully requested that Your Honor grant Plaintiffs' request to seek leave to amend the Amended Complaint.

Thank you for Your Honor's time and attention to this request.

Respectfully submitted,

WHITE RICOTTA & MARKS, P.C.

_____/s_____
Jamie Haar

cc: Alexis Downs, Esq. (via ECF)